

Exhibit “F”

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DELAGÉ LANDEN FINANCIAL
SERVICES, INC.,**

Plaintiff,

**TOSHIBA AMERICA MEDICAL
SYSTEMS, INC.**

Plaintiff/Intervenor,

V.

DESOTO DIAGNOSTIC IMAGING,
LLC., RANDON J. CARVEL, LYNN T.
CARVEL, DELTA RADIOLOGY, P.C.
and ZOBAR PROPERTIES, LLC

Defendants.

CIVIL ACTION NO. 2:02CV2810

HON. RONALD L. BUCKWALTER

**OBJECTIONS AND RESPONSES OF PLAINTIFF/INTERVENOR
TOSHIBA AMERICAN MEDICAL SYSTEMS, INC. TO DEFENDANTS'
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff/Intervenor Toshiba America Medical Systems, Inc. ("TAMS"), by and through its undersigned attorneys and pursuant to Federal Rule of Civil Procedure 34, objects and responds to Defendants DeSoto Diagnostic Imaging, LLC, Randon J. Carvel, Lynn T. Carvel, Delta Radiology, P.C., and Zobar Properties, LLC's ("Defendants" or "DeSoto") Fourth Request for Production of Documents as follows:

GENERAL OBJECTIONS

1. TAMS objects to the Requests, Instructions and Definitions to the extent that they purport to impose upon TAMS obligations different from, or beyond those, required by the Federal Rules of Civil Procedure.
2. TAMS objects to the Requests, Instructions and Definitions to the extent that they seek documents protected by the attorney-client privilege, the work product doctrine or

subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

- 108. Any and all documents regarding each and every similar occurrence of problems experienced by third parties with regard to the equipment involved in the subject matter of this lawsuit.**

RESPONSE:

TAMS objects to this Request as vague and overbroad in that it fails to set forth and describe the items requested to be reviewed “with reasonable particularity” as required by Federal Rule of Civil Procedure 34(b). TAMS further objects to this Request as irrelevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

- 109. Any and all documents regarding Imaging Solutions, Inc., James V. Ferguson, Jr. M.D. and Donny Owens, M.D.**

RESPONSE:

TAMS objects to this Request as vague and overbroad in that it fails to set forth and describe the items requested to be reviewed “with reasonable particularity” as required by Federal Rule of Civil Procedure 34(b). TAMS further objects to this Request as irrelevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence as Imaging Solutions, Inc., James V. Ferguson, Jr., M.D. and Donny Owens, M.D. are not parties to this lawsuit.

- 110. Any and all documents that relate to Toshiba America Medical Systems, Inc.’s efforts to perform a mechanical shim or an electronic shim.**

RESPONSE:

TAMS objects to the phrase “efforts to perform” and “mechanical shim or an electronic shim as vague, ambiguous and undefined. TAMS further objects to this Request as vague and

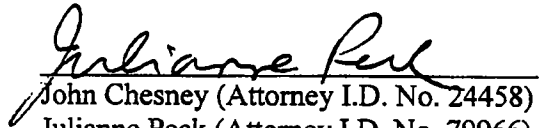
DeSoto, have been produced in response to Defendants' First Request for the Production of Documents.

129. **Any and all documents relating to complaints or inquiries from third parties regarding the same or similar type equipment involved in the subject matter of this lawsuit.**

RESPONSE:

TAMS objects to this Request as vague and overbroad in that it fails to set forth and describe the items requested to be reviewed "with reasonable particularity" as required by Federal Rule of Civil Procedure 34(b). TAMS further objects to this Request as irrelevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

Date: January 13, 2004


John Chesney (Attorney I.D. No. 24458)
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Attorneys for Plaintiff/Intervenor
Toshiba America Medical Systems, Inc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that today I caused a true and correct copy of Plaintiff/Intervenor Toshiba America Medical Systems, Inc.'s **OBJECTIONS AND RESPONSES TO DEFENDANTS' FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS** to be served upon counsel of record for all of the other parties to this proceeding at the following addresses as follows:

Facsimile and First Class Mail

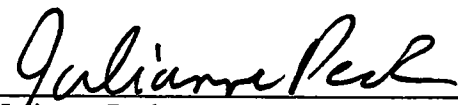
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Dated: January 13, 2004



Julianne Peck